

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

MAYA PARIZER et al.,

Plaintiffs,

v.

AJP EDUCATIONAL FOUNDATION, INC.  
et al.,

Defendants.

Civil No. 1:24-00724-RDA-IDD

**DEFENDANT AJP EDUCATIONAL FOUNDATION’S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS**

Defendant AJP Educational Foundation, Inc., d/b/a American Muslims for Palestine (“AMP”) by and through undersigned counsel, pursuant to Local Rule 7, moves this Court for an extension of time to respond to Plaintiffs’ Complaint by 45 days, up to and including July 12, 2024.<sup>1</sup> Defendant’s current deadline is May 28, 2024. Defendant’s counsel conferred via email with counsel for Plaintiffs, who advise that they do not oppose this extension. See e-mail at Exhibit A hereto. Defendant files a proposed order as well attached hereto. In support of this Motion, Defendant presents the following:

Plaintiffs filed their Complaint in this Court on May 1, 2024. On May 2, this Court issued Summons as to Defendant AMP. Plaintiffs served Defendant via its Executive Director, Osama Abuirshaid, on May 7, 2024. Undersigned counsel, Christina Jump, who has represented AMP in

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<sup>1</sup> This Motion is on behalf of, and undersigned counsel represents only, AJP Educational Foundation, Inc., d/b/a American Muslims for Palestine (“AMP”). While Plaintiffs’ counsel lists in the Complaint that Defendant National Students for Justice in Palestine (“NSJP”) may be served at AMP’s place of business, these are separate defendants and both AMP and the undersigned counsel refused to accept service for NSJP. As evidenced by publicly available documents, and as explained to counsel for Plaintiffs, there is zero corporate relationship between AMP and NSJP. AMP is not the “parent” of NSJP in any form. *See* Exhibit A.

separate federal civil litigation for eight years, is based in Texas and began searching in earnest for local counsel to support this litigation per this Court's Local Rules. Therefore, on Tuesday, May 21, Ms. Jump contacted Plaintiffs' counsel to inquire whether they would oppose a 45-day extension to Defendant's deadline to respond. Plaintiffs' counsel indicated that they would not. Exhibit A.

Defendant seeks this extension, in part because it only recently secured local counsel for this matter, in accordance with this Court's Local Rules. Further, the Complaint in this matter constitutes 141 paragraphs. Therefore Defendant requires additional time to prepare its response. This request is submitted in good faith, and not for the purposes of delay.

Accordingly, Defendant AMP respectfully requests a 45-day extension to file a response to the Complaint, up to and including July 12, 2024.

Defendant AMP waives a hearing.

Respectfully submitted this 24th day of May, 2024.

/s/ George R.A. Doumar

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*\*The Constitutional Law Center  
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Muslim Legal Fund of America*

*Attorneys for Defendant AMP*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 24<sup>th</sup> day of May 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ George R.A. Doumar  
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